



Department of  
**Human Services**

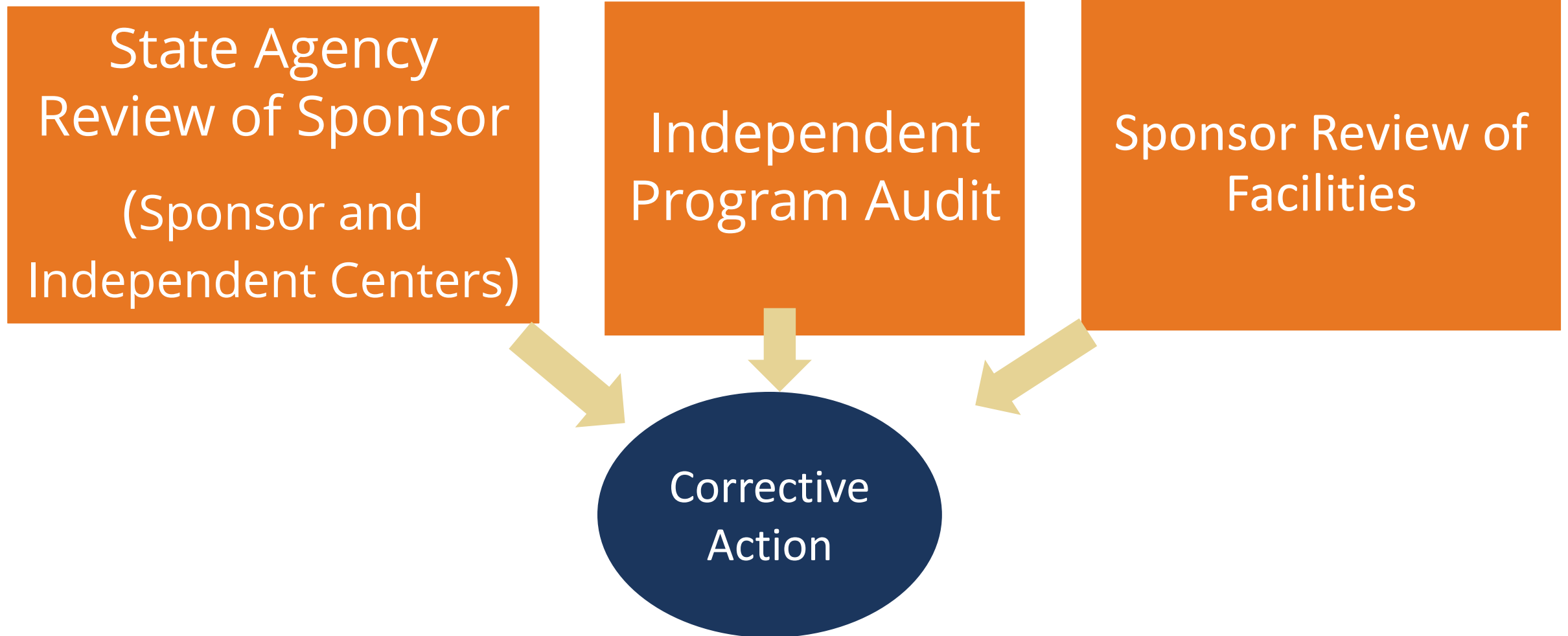
## Corrective Action Plan

Child and Adult Care Food Program

# Learning Outcomes

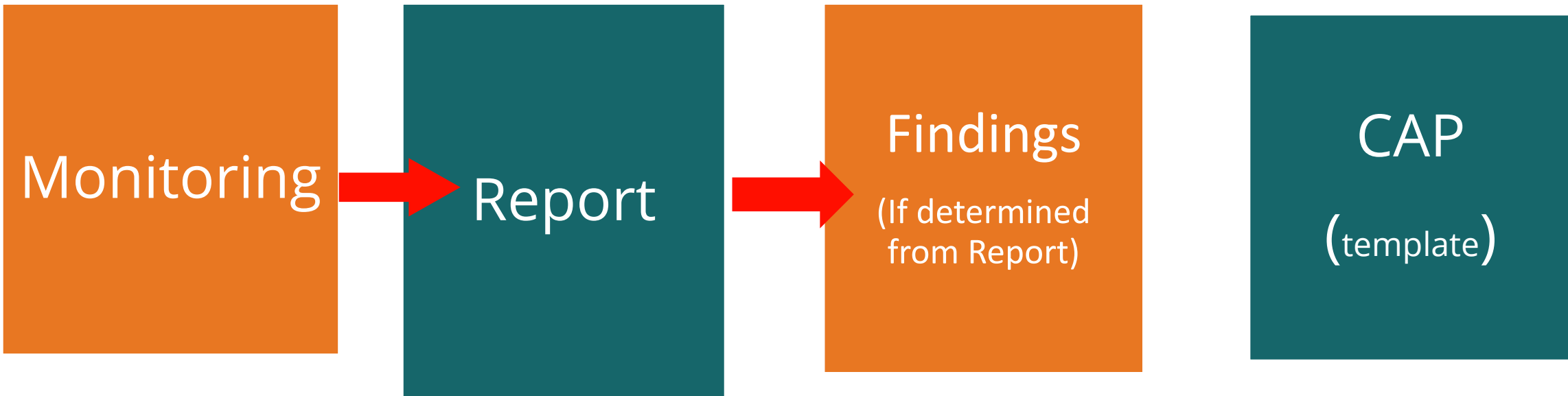
- Explain the purpose of corrective action.
- Analyze the root cause of noncompliance resulting in the corrective action.
- Understand the relationship between corrective action and a corrective action plan (CAP).
- Identify the components of a corrective action plan.  
Evaluate the effectiveness of a corrective action plan.
- Share best practices for sponsoring organizations and independent sponsors.

# Corrective Action



# Corrective Action Finding

## CAP Process:



# Corrective Action Finding

Program  
Noncompliance



Finding



Corrective Action

# Corrective Action Definition

## Corrective Action

The **action** the facility will take within a specific time frame to address the finding(s) of noncompliance and to prevent it from recurring.

2CFR 200.26

# Corrective Action Is

Corrective  
Action

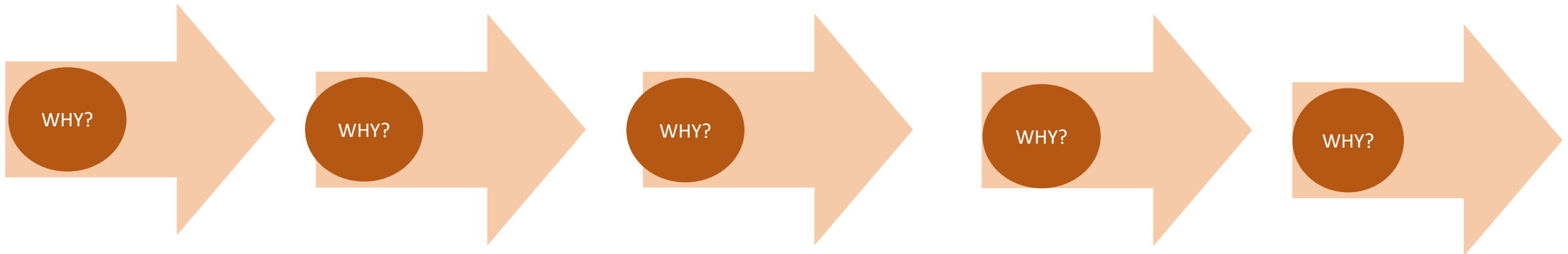


- New or improved processes or procedures
- Implemented within a specific timeframe
- Expected to resolve the condition that resulted in noncompliance
- Expected to prevent recurrence
- Identifiers who is responsible for implementing and maintaining new processes or procedures

# Why ask WHY?

Why ask WHY?

## The 5 Whys

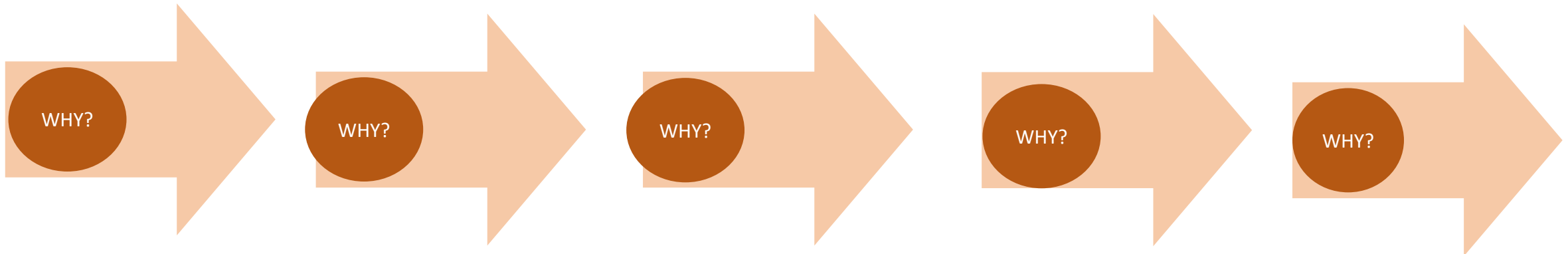


Root-Cause Analysis

# Why ask WHY? - CONTINUED

## Why ask WHY?

### The 5 Whys

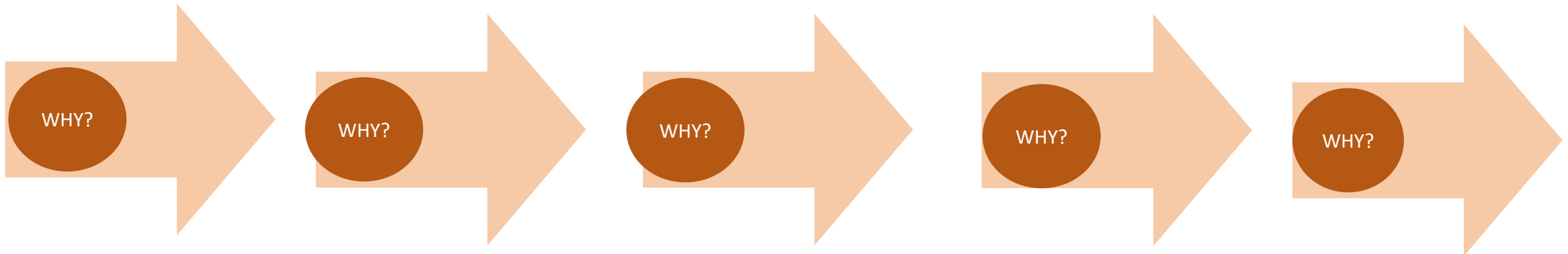


Root-Cause Analysis

# Why ask WHY? - CONTINUED

## Why ask WHY?

### The 5 Whys

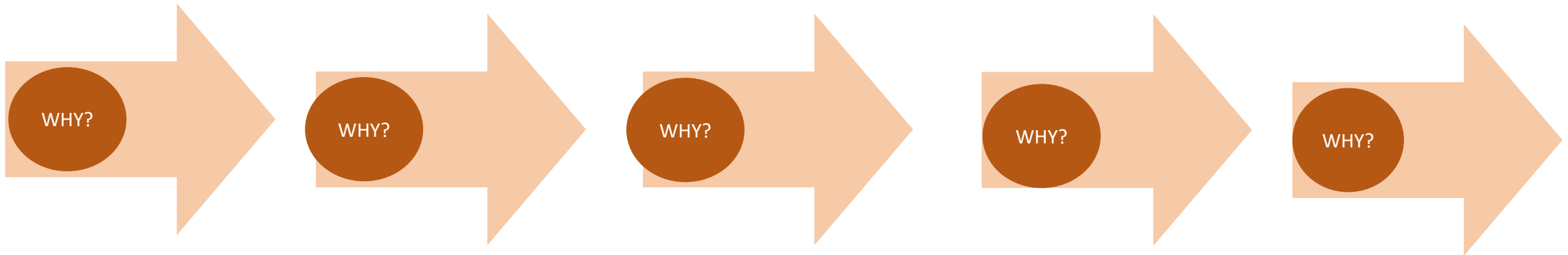


Root-Cause Analysis

# Why ask WHY? - CONTINUED

## Why ask WHY?

### The 5 Whys



Root-Cause Analysis

# NOW WHAT?

## Now What?

**Root-Cause**



**Corrective  
Action  
PLAN**

**Corrective action is documented in a corrective action plan.**



Copyright: MH Miles Company –A USDA-Funded Project

12  
5

# Corrective Action Plan Definition

## Corrective Action Plan

A written response that details the specific action the facility will take within a specified time frame to permanently correct the noncompliance.

2 CFR 200.511(c)

# CORRECTIVE ACTION PLAN REQUIREMENT

## Corrective Action Plan



- Details step-by-step actions.
- Actions must resolve the root-cause condition that resulted in the noncompliance.
- Actions must prevent recurrence.
- Process and procedures are consistent with federal regulations, State policy, and organization requirements.

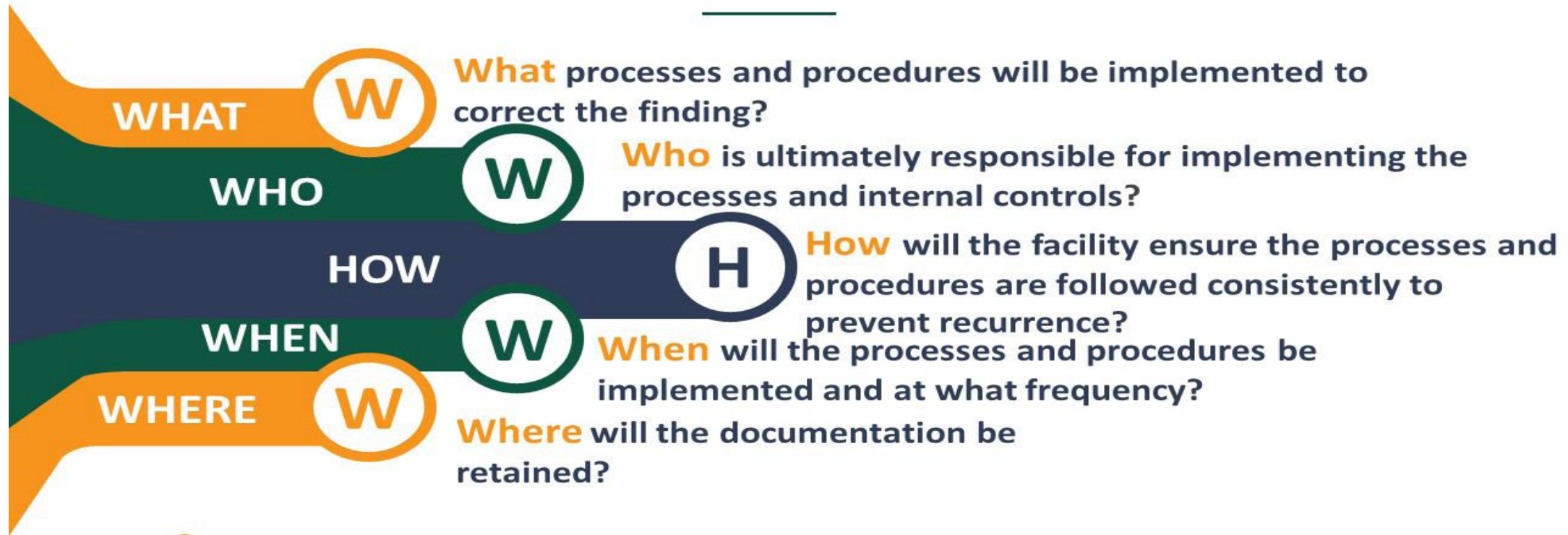


Copyright: MH Miles Company—A USDA-Funded Project

127

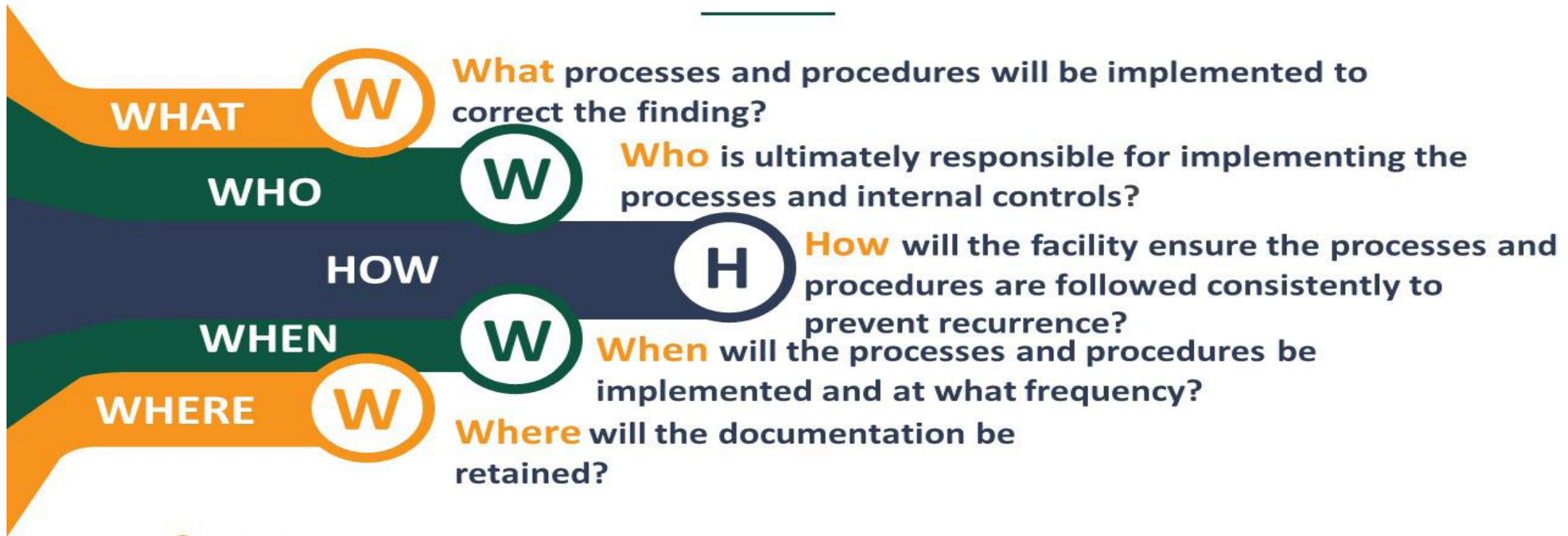
# DEVELOPING THE CORRECTIVE ACTION PLAN

## Developing the Corrective Action Plan



# DEVELOPING THE CORRECTIVE ACTION PLAN – CONT.

## Developing the Corrective Action Plan



# CAP SUPPORTING DOCUMENTATION

## CAP Supporting Documentation

- Income eligibility forms
- Enrollment forms
- Menus
- Child nutrition (CN) labels / manufacturers' product analysis sheets
- Recipes
- Attendance records
- Meal-count forms



Copyright: MH Miles Company—A USDA-Funded Project

12  
9

# Recommended Corrective Action Implementation Time Frames

## Recommended

## Corrective Action Implementation Time Frames

0–3 days

1–5 days

15 days

| Nonreimbursable meals

| Failure to maintain required program records

| Deadline for all corrective action implementation should not exceed 15 calendar days

# Recommended Corrective Action Implementation Time Frames - Continued

## Recommended

### Corrective Action Implementation Time Frames

0–3 days

1–5 days

15 days

| Nonreimbursable meals

| Failure to maintain required program records

| Deadline for all corrective action implementation should not exceed 15 calendar days



Copyright: MH Miles Company—A USDA-Funded Project

130

# Evaluating a CAP



## Evaluating a CAP

- Determine whether documented plan includes all required elements.
- Assess whether noncompliance is sufficiently addressed.
- Determine whether noncompliance is likely to recur.
- Assess whether corrective action has been fully implemented.



Copyright: MH Miles Company—A USDA-Funded Project

131

# Monitoring CAP



## Monitoring a CAP

- Accept the CAP.
- Verify implementation.
- Conduct follow-up visits.



Copyright: MH Miles Company—A USDA-Funded Project

136

# BEST PRACTICES FOR SUSTAINABILITY

## Best Practices for Sustainability

- Provide ongoing training on CACFP policies and procedures.
- Develop a facility-specific training program to address noncompliance.
- Monitor facilities on a quarterly basis.
- Establish and document policies for responding to corrective action and for writing CAPs.
- Conduct follow-up visits to review CAP implementation and compliance.
- Establish a CAP revision policy for nonserious deficiency findings.



Copyright: MH Miles Company –A USDA-Funded Project



137

# ACTIVITY: DEVELOPING A CAP

## ACTIVITY: DEVELOPING A CAP

# RECAP

## RECAP

- Purpose of corrective action
- Root-cause analysis
- Corrective action plan requirements
- Components of a CAP and evaluating effectiveness
- Best practices



# Nondiscrimination Statement

In accordance with civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](http://www.ascr.usda.gov/complaint_filing_cust.html), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture  
Office of the Assistance Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) Email: [program.intake@usda.gov](mailto:program.intake@usda.gov)

This institution is an equal opportunity provider.

# Contact Information

CACFP Main Telephone Line  
(615) 313-4749

CACFP Email  
[cacfp.dhs@tn.gov](mailto:cacfp.dhs@tn.gov)

Tennessee Information Payment System  
<https://tndhs.cnpus.com/prod/Splash.aspx>

CACFP-Department of Human Services  
[tn.gov/humanservices/children/dhs-nutrition-programs/child-and-adult-care-food-program.html](https://tn.gov/humanservices/children/dhs-nutrition-programs/child-and-adult-care-food-program.html)

Thank you!

THANK  
*You*